<u>REMARKS</u>

Claims 1-25 were pending at the time of the Office Action.
Claims 1, 12, 17, and 24 are independent claims. Claim 2 is
canceled without prejudice. Claims 1, 3, 12, 13, 14, and 15 are
amended in this response. No new matter is added. Claims 1 and
3-25 are pending at this time. Favorable reconsideration and
allowance of the above-referenced application are respectfully
requested.

It appears that the status of the claims in the
"Disposition of Claims" section in the Office Action Summary
contains typographical errors. This response is based on the
status of the claims stated in the "Detailed Action" section of
the Office Action.

<u>Allowable subject matter</u>

Claims 12-23 are allowable. Claims 3-11 and 25 are
indicated as allowable if rewritten as suggested in the Office
Action. This indication is acknowledged and the claims are
retained.

<u>Claim Objections</u>

Claims 1 and 12 are objected to. Claims 1, 12, 13, 14, and
15 are amended as suggested by the Office Action to overcome the

objections to claims 1 and 12. Accordingly, it is respectfully

requested that the objections to claims 1 and 12 be withdrawn.

    35 USC 102

    Claims 1, 2, and 24 stand rejected under 35 USC 102(b) as

allegedly being anticipated by Oechsle (US 5,570,466). These

rejections are respectfully traversed. The rejection of claim 2

is obviated by the cancellation of this claim.

    As amended, claim 1 recites, "receiving a routing address

comprising at least two routing identifiers, wherein the routing

address comprises a destination address; and building a routing

matrix to use in determining route identification operations to

be performed, the routing matrix identifying one or more of the

at least two routing identifiers that are to be used in routing,

wherein building the routing matrix comprises comparing the

destination address with a source address to identify a

difference." (Emphasis added). Oeschle does not describe all

the features recited in claim 1.

    Oeschle describes routing of data blocks or frames in a

local area communication system consisting of a plurality of LAN

segments interconnected by bridges. See, e.g., Oeschle, col. 1,

lines 10-13. Oeschle does not describe "wherein building the

routing matrix comprises comparing the destination address with

a source address to identify a difference," as recited in claim

1.   In this regard, Oeschle states:

> A test is made in comparing means 45 for each
> entry of the bridge's routing table whether the
> Destination LS number in the table corresponds to the
> Source LS number in the frame, and whether the Next LS
> number in the table entry corresponds to the input LS
> number of the respective frame.

See, Oeschle, col. 10, lines 24 – 29.

Thus, as described in Oeschle, the comparing means 45

compares the Destination LS number in the routing table to the

Source LS number in the frame.   However, Oeschle does not

describe that the comparing is done to identify a difference, as

claimed.   Since Oeschle does not describe comparing the

destination address with a source address to identify a

difference, as claimed, Oeschle does not disclose all the

features of the claimed subject matter.   Claim 1 should be

allowable at least for this reason.

Further, Oeschle states, "For routing of frames through a

system of bridge-connected network segments, a routing table is

stored in each bridge, and each frame includes fields for a

source segment identifier and a destination segment identifier."

(Emphasis added).   See, Oeschle at Abstract.   Thus, Oeschle

describes that a routing table is stored.   In this regard,

Oeschle states:

A table is stored in each bridge reflecting the
shortest path trees previously determined. FIG. 3
shows the format of such a table. It contains an
entry for each path tree which is going through the
respective bridge. The entry comprises: the LAN
segment number of the 'Destination LAN Segment' of the
respective path tree; the LAN segment number of the
'Next LAN Segment' (neighbor) to which the bridge must
forward a frame carrying the respective destination
(next hop); and one or more LAN segment numbers of
those 'Previous LAN Segments' on which frames can
arrive for the respective destination (previous hops).
Thus, the tables not only contain routing information
for forwarding frames to their destination, but also
reflect the tree structure by including the previous
LAN segments for each destination. (Emphasis added).

See, Oeschle, col. 4, line 66 – col. 5, line 12.

Thus, Oeschle describes that a table, reflecting the

shortest path trees previously determined is stored. The cited

portion of Oeschle (Oeschle, col. 3, line 57 – col. 4, line 13,

col. 5 lines 13 – 40, figure 2) does not describe that the

stored routing table is built. In contrast, claim 1 recites

"building a routing matrix to use in determining route

identification operations to be performed." (Emphasis added).

Since Oeschle does not describe building the stored routing

table in each bridge and since the claimed subject matter

relates to building a routing matrix, Oeschle does not describe

building a routing matrix, as claimed. Therefore, Oeschle does

not describe all the features recited in claim 1. Accordingly

claim 1 should be allowable.

Claim 24 recites, "a processor; means for receiving a

source address and a destination address, each comprising at

least two routing identifiers; means for using the processor to identify one or more differences between the source address routing identifiers and the destination address routing identifiers; means for determining a set of route identification operations based upon the one or more differences, wherein a different route identification operation is determined for each of the one or more differences; and means for routing data based upon the set of route identification operations." (Emphasis added).

As discussed previously, the cited portion of Oeschle (Oeschle, col. 3, line 57 – col. 4, line 13, col. 5, lines 13 – 40, col. 8, lines 25 – 45, col. 10, lines 20-40, figures 1, 2, 3) does not describe "means for using the processor to identify one or more differences between the source address routing identifiers and the destination address routing identifiers," as recited in claim 24. Oeschle does not describe, "means for using the processor to identify one or more differences between the source address routing identifiers and the destination address routing identifiers," as recited in claim 24. Since Oeschle does not describe means for using the processor to identify one or more differences, Oeschle clearly does not describe "means for determining a set of route identification operations based upon the one or more differences," as recited in claim 24. Thus, Oeschle does not describe all the features

recited in claim 24. Claim 24 should be allowable at least for this reason.

<center>CONCLUSION</center>

In view of the amendments and remarks herein, claims 1 and 3-25 are in condition for allowance and a notice of allowance is respectfully requested. It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific issue or comment does not signify agreement with or concession of that issue or comment. Because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

It is respectfully suggested for all of these reasons, that the current rejections are overcome, that none of the cited art teaches or suggests the features which are claimed, and therefore that all of these claims should be in condition for allowance. A formal notice of allowance is thus respectfully requested.

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No. 06-1050.

Respectfully submitted,

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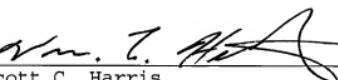
Scott C. Harris
Reg. No. 32,030
Attorney for Intel Corporation

Fish & Richardson P.C.
PTO Customer No.: **20985**
12390 El Camino Real
San Diego, California 92130
(858) 678-5070 telephone
(858) 678-5099 facsimile

WILLIAM E. HUNTER
REG. NO 47,671

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